

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

MARIO QUINTANILLA, #03470071

Plaintiff,

v.

**CAPTAIN MARTIN GONZALES,
SHERIFF DAVID SOWARD, AND
OFFICER AMANDA FAZ,**

Defendants.

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SA-20-CV-563-DAE

JURY DEMANDED

**COUNTY DEFENDANTS' MOTION FOR EXTENSION OF TIME TO FILE
SUPPLEMENT TO MOTION FOR SUMMARY JUDGMENT**

Defendants Captain Martin Gonzales, Sheriff David Soward and Officer Amanda Faz, (collectively, the "County Defendants") file this Motion for Extension of Time to File Supplement to Motion for Summary Judgment and state as follows:

PROCEDURAL BACKGROUND AND STATUS

The County Defendants filed a Motion to Dismiss Plaintiff's Amended Complaint (ECF No. 14).

After construing the Motion to Dismiss as a Motion for Summary Judgment (ECF No. 15), the Court ordered the County Defendants to file a supplement addressing Plaintiff's claim construed under the Fourteenth Amendment on or before February 17, 2021 (ECF No. 21).

GROUND FOR RELIEF

Last week, Texas experienced a winter storm with widespread power outages, some planned and some not. The undersigned counsel were without internet, electricity and water for an extended period of time.

The County Defendants request a 14-day extension of time to file a supplement to their motion for summary judgment. Under the County Defendants' requested extension of time, the County Defendants' new deadline would be Wednesday, March 3, 2021.

The County Defendants have not been able to communicate with Plaintiff. Plaintiff is, therefore, presumed opposed.

PRAYER

The County Defendants request the Court grant this Motion for Extension of Time to File Supplement to Motion for Summary Judgment by extending the deadline until March 3, 2021.

Respectfully submitted,

/s/ Ben Zinnecker

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COUNSEL FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of February, 2021, a true and correct copy of the foregoing document was forwarded to all known counsel of record pursuant to the Federal Rules of Civil Procedure.

/s/ Ben Zinnecker

Ben Zinnecker